

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

NAJMAH TORRES-JUSTINIANO; and
TAMIKA PARKER as Next Friend of
R.T., a minor child, as Wrongful Death
Representatives of Jose Torres.

PLAINTIFFS,

v.

CORECIVIC d/b/a “TROUSDALE
TURNER CORRECTIONAL
FACILITY,” TROUSDALE COUNTY,
TENNESSEE; a Tennessee municipality;
WARDEN MARTEN FRINK, in his
individual capacity; LYBRUNCA
COCKRELL, in her individual capacity;
TALBERT JEFFERSON, in his individual
capacity; and JACQUELINE NORMAN,
in her individual capacity,

DEFENDANTS.

Case No. 3:23-cv-00191
District Judge Eli J. Richardson
Magistrate Judge Jeffery S. Frensley

JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV.
PRO. 38(a) & (b)

JOINT STATUS REPORT

COME NOW, the parties, Najmah Torres-Justiniano and Tamika Parker, as Next Friend of R.T. a Minor Child, as Wrongful Representatives of Jose Torres (“Plaintiffs”) represented by attorneys Brice M. Timmons and Craig A. Edgington and Defendants CoreCivic, Inc., Trousdale County, Tennessee, Lybrunca Cockrell, Martin Frink, Talbert Jefferson, and Jacqueline Norman (“Defendants”) represented by attorneys Joseph F. Welborn, Erin Palmer Polly, and Terrence M. McKelvey (collectively the “Parties”), and hereby file this *Joint Status Report* and thereof state as follows:

1. On September 23, 2024, Plaintiffs transmitted a settlement demand. Defendants

have not yet responded with their thoughts on settlement because they only received Plaintiffs' demand today, but they will respond in accordance with the Case Management Order. The parties are assessing whether alternative dispute resolution will assist in the resolution of this case and will continue to assess the viability of resolution and discuss the possibility with one another as they await the Court's ruling on Plaintiffs' *Motion to Extend Discovery Deadline* (ECF 66).

Respectfully submitted,

/s/Craig A. Edgington

Craig A. Edgington (TN Bar #38205)

Brice M. Timmons (TN Bar #29582)

WATSON BURNS, PLLC

5865 Ridgeway Center Parkway

Suite 300

Memphis, TN 38120

(901) 529-7996 – Office

(901) 877-4629 – Facsimile

cedgington@watsonburns.com

btimmons@watsonburns.com

/s/Joseph F. Welborn, III

Joseph F. Welborn, III

Erin Palmer Polly

Terrence M. McKelvey

K & L Gates, LLP

501 Commerce Street

Suite 1500

Nashville, TN 37203

joseph.welborn@klgates.com

terrence.mckelvey@klgates.com

erin.polly@klgates.com

Counsel for Defendants CoreCivic, Inc.,

Trousdale County, Tennessee, Lybrunca Cockrell,

Martin Frink, Talbert Jefferson, and Jacqueline

Norman

CERTIFICATE OF SERVICE

I HEREBY certify that a true and exact copy of the foregoing has been served to the following parties via this Court's ECF filing system this 23rd day of September 2024.

Joseph F. Welborn, III
Erin Palmer Polly
Terrence M. McKelvey
K & L Gates, LLP
501 Commerce Street
Suite 1500
Nashville, TN 37203
joseph.welborn@klgates.com
terrence.mckelvey@klgates.com
erin.polly@klgates.com
*Counsel for Defendants CoreCivic, Inc.,
Trousdale County, Tennessee, Martin
Frink, and Jacqueline Norman*

Toni-Ann Dolan
Assistant Attorney General
PO Box 20207
Nashville, TN 37202-0207
Toni-ann.dolan@ag.tn.gov
Attorney for Non-Party Tennessee Department of Correction

David Wickenheiser
Assistant Attorney General
PO Box 20207
Nashville, TN 37202-0207
David.wickenheiser@ag.tn.gov
Attorney for Non-Party General Lawson

/s/Craig A. Edgington